



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

August 3, 2016

BY ECF and FAX

Honorable Alvin K. Hellerstein
United States District Judge
500 Pearl Street
New York, N.Y. 10007

**Re: *United States v. Certain Funds on Deposit in Various Accounts Detailed Herein,
and All Funds Traceable Thereto, 16 Cr. 2800 (AKH)***

Dear Judge Hellerstein:

The Government respectfully submits this letter to provide the Court with an update as to the status of the above-captioned case.

On April 14, 2016, the Government filed an *in-rem* civil forfeiture complaint, 16 Cr. 2800 (AKH) (the "Complaint"), with respect to assets held in twenty (20) bank accounts (the "Defendant Assets") located throughout the world. The Civil Complaint alleges that the Defendant Assets are subject to civil forfeiture because they (1) constitute or were derived from proceeds traceable to wire fraud, and thus, are subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 984; (2) constitute property involved in various forms of money laundering, and are therefore subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(A) and 984.

Since the filing of the Complaint, the Government has endeavored to provide notice to all potential claimants with an interest in the Defendant Assets, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions (the "Supplemental Rules"). As detailed below, the Government has done so through both internet publication available to the general public and through direct notice to all known potential claimants. To date, no claims have been filed with respect to any of the Defendant Assets.

As an initial matter, the Government commenced internet publication on or about April 21, 2016. The deadline for claims submitted based on that internet publication expired on June 20, 2016. No claims were filed with the Government with respect to any of the Defendant Assets based on that internet publication.

By: /s/
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